

# HARRELL & HARRELL

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September 3, 2014

## FREEDOM OF INFORMATION ACT REQUEST

US EPA, Region 4  
Sam Nunn Atlanta Federal Center  
61 Forsyth Street, SW  
Atlanta, GA 30303

Re: Clark v. Alabama & Tennessee River Railway

Dear Sir/Madam:

Pursuant to 5 U.S.C. § 552, we are submitting this Freedom of Information Act (FOIA) request to gather safety and other information relative to OMNITRAX d/b/a ALABAMA AND TENNESSEE RIVER RAILWAY (ATRR) and the Goodyear plant premises in Gadsden, Etowah County, Alabama.

We are specifically seeking release of the following information:

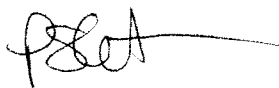
Any and all documents related to any incidents and/or derailments on or around the railroad track inside, outside or around the Goodyear tire plant in Gadsden, Alabama for the two years prior to July 23, 2012.

We understand that there may be a charge to us for providing the above cited records, and we agree to pay the reasonable fee.

Should you have any questions regarding this FOIA request please do not hesitate to contact us.

Thank you in advance for your prompt attention and response to this request.

Sincerely,



JRH/pes

Paige E. Schmidt  
Paralegal to James R. Holland, II